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September 10, 2002

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**RE: Ex Parte Notice**

**CC Docket Nos. 02-33, 95-20, 98-10. In the Matter of Appropriate Framework for Broadband Access to the Internet over Wireline Facilities; Universal Service Obligations of Broadband Providers; Computer III Further Remand Proceedings; Bell Operating Company Provision of Enhanced Services; 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards and Requirements**

**CC Docket No. 01-337. In the Matter of Review of Regulatory Requirements for Incumbent LEC Broadband Telecommunications Services**

**CC Dockets Nos. 01-338, 96-98, 98-147. In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability**

Dear Ms. Dortch:


On September 10, 2002, Morton Bahr, President of the Communications Workers of America, mailed the attached study, *Putting Broadband on High Speed: New public policies to encourage rapid deployment* by Dr. Stephen Pociask, to Chairman Michael Powell, Commissioners Kathleen Abernathy, Kevin Martin, and Michael Copps, and the attached list of FCC staff.

The study documents the important social and economic benefits of broadband deployment, including its job creating potential. The report analyzes the economic impact of the divergent regulatory regimes for cable and wireline broadband technologies and makes the case for regulatory parity, arguing that regulatory parity will send the correct signals to capital markets and thereby encourage investment and broader deployment.

Sincerely,



Debbie Goldman, Research Economist  
Communications Workers of America

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cc: Attached List

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Morton Bahr  
President

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September 10, 2002

Dear Colleagues:

I have enclosed an important Economic Policy Institute report, *Putting Broadband on High Speed*, by Dr. Stephen Pociask. The report discusses the underlying economic and regulatory framework for our communications and information technology industry, which has lost more than 500,000 jobs in the past 18 months. More than 40,000 to 50,000 of those are union jobs.

This downturn impacts our entire economy. Investment in information technology accounted for one-quarter of the growth in gross domestic product in recent years.

It is imperative that policymakers take action to jumpstart the telecommunications industry by encouraging investment in broadband networks.

According to the enclosed report, 1.2 million new jobs would be created by full deployment of broadband networks. Widespread broadband deployment would create many social benefits, including telemedicine, economic development, job training, distance learning, public safety, and services for the disabled. Universal broadband deployment would result in \$500 billion in consumer welfare benefits.

But, according to the EPI report, current regulation discourages investment in high-speed Internet access technologies. Although cable, telephone, and wireless technologies are converging to provide broadband services, regulations have not kept pace. Cable modem services are generally free of regulations, while telephone companies' high-speed DSL services are highly regulated.

The solution, according to the report, is symmetrical regulation of all broadband technologies to create a level playing field for competition and investment. A new regulatory framework will unleash a new wave of investment in next-generation broadband networks and services.

The Communications Workers of America (CWA), the leading union representing workers in the telecommunications industry, looks forward to working with you to encourage policymakers to adopt the appropriate regulatory framework to encourage universal, affordable deployment of broadband networks.

Sincerely,

Morton Bahr  
President

Enclosure